

## **MSB Registration List**

The MSB Registration List, which is updated and posted on a monthly basis, contains entities that have registered as Money Services Businesses (MSBs) pursuant to the Bank Secrecy Act (BSA) regulations at 31 CFR 103.41, administered by the Financial Crimes Enforcement Network (FinCEN). Once a year in May, FinCEN drops from the updated List any entities that have not renewed their MSB registrations by the renewal deadline.

FinCEN coordinates outreach activities with the IRS Stakeholder Liaison staff annually to remind these dropped entities of the requirement to register. The IRS contacts those businesses that appear to have failed to renew their registrations, usually by the end of August, to determine if this was an inadvertent error or if the businesses no longer conduct MSB services that would require them to register. This outreach includes mailing of the following letter [click here]. This helps FinCEN achieve its strategic goal of educating the MSB industry concerning BSA requirements.

Why MSBs that have renewed their registrations in a timely manner may still receive a "registration reminder" letter: FinCEN identifies the most recent registration filed by an MSB by looking at the information provided on the registration form in Item 9 – the Taxpayer Identification Number or TIN (also known as the EIN for entities and the SSN or ITIN for individuals). If your company changed TINs, FinCEN has no way of knowing that both TINs belong to one company renewing its registration. As a consequence, if you previously registered using one TIN, and you have renewed using a different TIN, IRS will send a registration reminder letter to indicate that the business using the original TIN has been dropped from FinCEN's posted List. However, your business registration using the new TIN should still appear on the posted List if you renewed your business registration in a timely manner. In that case, you do not need to take any action in response to the IRS registration reminder letter.

This new April 2009 List, which is current as of April 14, 2009, contains data on <u>42,622</u> <u>registered MSBs</u>. This is an increase of 570 MSB registrations from the March 17, 2009 total of 42,052.

The List reflects information exactly as provided by the registrants. It is arranged alphabetically by state, then by each city within the state, and finally by Registrant name within each city. Posted entries should include: (1) Registrant's legal name, (2) Registrant's "doing business as" name, (3) Registrant's address, (4) MSB services the Registrant provides, (5) states in which Registrant offers MSB services, (6) number of branches, (7) date the registration form was signed, and (8) date the registration form was received.

Why two (2) dates are being provided on the List: The date the registration form was signed is often missing. There are currently over 1,000 MSB registrations in the database that are missing signature dates. However, the IRS-Enterprise Computing Center-Detroit (ECC-D) records the date on which it received the registration. The signature dates and received dates should not differ significantly. Posting both the signature date, if provided, and the received date will assist the public in determining when MSBs may be due to renew their registrations with FinCEN.

The List is intended only as general reference for the public and should not be treated as determinative of an entity's registration status. The only determinative evidence of an entity's registration status is the acknowledgement letter from IRS-ECC-D that an entity receives after filing its registration. The MSB should retain a copy of this acknowledgment letter, along with a facsimile of the registration form, as a part of its records for five years.

FinCEN continues to work with IRS-ECC-D on data quality issues concerning the List.

For more information on MSB registration, visit www.fincen.gov.

For inquiries regarding the **MSB registration list**, call FinCEN MSB Regulatory Helpline at 1-800-949-2732.

For inquiries regarding **MSB registration acknowledgement letters**, call IRS-ECC-D Hotline at 800-800-2877.

MSB Registration List – April 2009 (Click on hyperlink to List.)

THE INCLUSION OF A BUSINESS ON THIS LIST
IS NOT A RECOMMENDATION OR ENDORSEMENT OF THE BUSINESS BY
ANY GOVERNMENT AGENCY.